

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

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THOMAS M. GOULD
CLERK, U.S. DISTRICT COURT
W/D OF TN, JACKSON

William Horton, Chris Cook, Adonius bill,
Jesse James, James W. Mailland, Johnathan Gordon

Jacoby Pearson, Malcolm Lee, Mike Horton, Clarence Combs, Roy Newberry, Darryl Walker, Jeffrey Anderson,
(Enter above the full name of the plaintiff Jeff Webb, John Palmer, William Moore
or plaintiffs in this action.)

vs.

Chuck Arnold, Sherry Jo Smith, Jeff Mailland, Sgt Charles Simpson
Sgt. Ben Lee, Melissa Hunt, Renee Terrell, Mike Webb,
The Gibson County Sheriff department.

(Enter above the full name of the defendant
or defendants in this action.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS UNDER 42 U.S.C., §1983

I. Previous Lawsuits

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment? Yes ☒ No ☐

B. If your answer to A is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit

Plaintiffs: William Horton, Chris Cook, Adonius bill, Jesse James, James W. Mailland, Johnathan Gordon
William Moore, Jacoby Pearson, Malcolm Lee, Mike Horton, Clarence Combs, Roy Newberry, Darryl Walker, Jeffrey Anderson,
Defendants: Chuck Arnold, Sherry Jo Smith, Jeff Mailland, Sgt Charles Simpson, Sgt Ben Lee, Jeff Webb
Melissa Hunt, Renee Terrell, Mike Webb, The Gibson County Sheriff department, John Palmer

2. Court (if federal court, name the district; if state court, name the county):

Western district of Tennessee Jackson Tenn

3. Docket Number: 13-1250-JDT, 12-1279-JDT

4. Name of judge to whom case was assigned: Magistrate James D. Todd

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

The Case is still Pending

6. Approximate date of filing lawsuit: 10/30/2012 - 12/04/2012

7. Approximate date of disposition: Still pending

II. Place of Present Confinement: The Gibson County Complex in Trenton Tenn

A. Is there a prisoner grievance procedure in the institution?

Yes ☒ No ☐

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?

Yes ☒ No ☐

C. If your answer is Yes:

1. What steps did you take? First did a Inmate request form, wrote TCI Tdoc

2. What was the result? Nothing, happened Sheriff dept Staff didn't respond to Grievance's

D. If your answer is No, explain why not: _____

III. Parties

(In item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

A. Name of Plaintiff William Horton
Address 401 North College Street Trenton Tennessee 38382

(In item B below, place the full name of the defendant in the first blank, his official position in the second blank, and his and his place of employment in the third blank. Use Item C for the names, positions, and places of employment of an additional defendants.)

B. Defendant Chuck Arnold is employed as
Sheriff at The Gibson County Complex Jail
at Trenton Tennessee 38382

C. Additional Defendants: Sherry Jo Smith, Jeff Marland, Sgt Charles Simpson, Sgt. Ben Lee
Melissa Hunt, Renee Terrell, Mike Webb, The Gibson County Sheriff department,

IV. Statement of Claim

State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheet if necessary.

Under 560 "Civil detainee Conditions of Confinement" We have wrote, TCI Tdoc Tenn Human Rights Commission The director of "Health Services" in Nashville Tenn about our Living Conditions here at the Gibson County Complex, We are getting discriminated on Medical Needs, this facility has Mold in the Showers, We are Not Getting the proper food Some inmates need to be on Modified diets, We don't get Milk products We don't have the right Cleaning Sanitizer for or Too Kill the HIV, "Stiff infection" which some inmates have, also hepatitis we don't have the proper Issued clothes or Foot Wear. We are Not Getting 1400 Cal a day This facility is really Nasty TCA 44-4-140 Medical Services 1400- 1-13 from TCI Say we Shouldnt get denied Medical,

V. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments.

Cite no cases or statutes.

Inmates Want Compensation for pain and Suffering and for Some
of these Officers To be Sired for these Conditions

560 Civil detainee Conditions of Confinement

VI. Jury Demand

I would like to have my case tried by a jury. Yes ☒ No ☐.

I (We) hereby certify under penalty of perjury that the above complaint is true to the best of our information, knowledge, and belief.

Signed this 25th day of January, 2013.

William Horton, Columbus Biddle

Danish L. Walker, Jacoby P. Leff, Webb, Jeffrey Anderson

James M. Cook, Roy Newberry

(Signature of Plaintiff/Plaintiffs) Clarence Combs

James Mailand, Malcolm Lee, Mike Horton

Johnathon Gordon, William Moore

Attached Sheet From Statement of Claim.

□ 560 Civil Detainee Conditions of Confinement

We recently wrote the Director of Health Services in "Nashville Tennessee" about the "Living Conditions" here at the "Gibson County Complex" and also went thru "Grievance protocol" about filthy this facility is which they know. upon talking with the jail administrator she claimed that she would try to make changes. and we would get the proper cleaning things to clean this facility which changes have not happened. We don't have the proper Sanitizers to kill the hiv, or "Staff infection" which some inmates have also hepatitis. Some inmates have broken bones which they want send you to an outside doctor to get it fixed "John Palmer" broke his finger when he slipped or fell which he was sent "Medical attention". We had to file paperwork thru the "Fdoe" to get "indigent packs" but this facility has taken the Soap out of them a lot of inmates don't get funds too by Soap. ~~Some~~ Some inmates need teeth pulled some need Mouth Surgery and other Medical needs, Under Tok 41-4-140 Under "Medical Services" 1400 1-13 it says this facility is responsible for our Medical needs. We need Sanitizers to Clean with some inmates need "Modified diets" we don't get Milk, we ~~don't~~ don't have the proper Clothing jail issued, the proper foot wear. We also have ~~Wood~~ Mold in our Showers which is not healthy to breathe.